



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



379598

December 8, 2004

Mr. Ben Pfefferle, III
On Behalf of the Granville Solvents Site Management Group, LLC
Baker & Hostetler LLP
65 East State Street - Suite 2100
Columbus, OH 43215

Re: Proposal to Suspend Groundwater and Soil Treatment System Operation
Granville Solvents, Inc. Site ("GSI"), Granville, OH

Dear Mr. Pfefferle:

U.S. EPA, in consultation with Ohio EPA, has reviewed the August 2004 proposal from the Granville Solvents Site Management Group, LLC ("Group") to shut down the treatment systems at the GSI site and enter into a three-year period of monitoring site conditions. We concur with the proposal to shut down the treatment systems, however, our concurrence is conditioned on the receipt of a draft contingency plan from the Group by January 3, 2005.

Further, with regard to the monitoring period, we believe that there are a few issues to be worked out between the Agencies and the Group, especially the technical concerns expressed to me by Ohio EPA in its comment letter of November 16, 2004. For instance, a three-year monitoring period will not be acceptable given the changing future site-use conditions. In addition, U.S. EPA Region 5 as a matter of policy may perform a Five-Year Review at this site because it has not been cleaned up to levels that allow for unlimited exposure to residual contaminants and unrestricted use of the site.

I have enclosed a copy of Ohio EPA's comment letter to me for your reference. Please review and provide comments on these matters to me by January 31, 2005. In addition, until a new monitoring plan is approved, please continue to monitor groundwater at the GSI site in accordance with the currently approved monitoring plan.

Please contact me at 312-886-7078 or at adler.kevin@epa.gov should you have any questions concerning the above.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Adler", with a stylized flourish at the end.

Kevin Adler
Granville Solvents Project Manager

cc: P.Felitti, C-14-J
Fred Myers, Ohio EPA
Gerry Myers, M&E